REMARKS/ARGUMENTS

The arguments and amendments presented herein include the arguments and amendments Applicants discussed with the Examiner during the phone interview dated November 7, 2007. Applicants submit that the arguments and amendments presented herein make the substance of the phone interview of record to comply with 37 CFR 1.133. If the Examiner believes that further information on the interview needs to be made of record to comply with the requirements, Applicants request the Examiner to identify such further information.

Para. 18 of the Specification is amended to make the modification proposed by the Examiner to overcome the objection on pg. 2 of the Office Action.

Para. 7 is amended to correct reference numerals for certain elements consistent with FIG. 2.

Applicants amended claims 1, 2, 4, 9, 11, 12, 15, 19, 20, 23, and 26 to clarify local and remote devices, interfaces and topology information.

The Examiner rejected claims 1-9 and 11-29 as anticipated (35 U.S.C. §102) by Kracht (U.S. Patent No. 6,377,987). Applicants traverse with respect to the amended claims.

Amended claims 1, 11, 19, and 22 require: generating local topology information including information on local interfaces in a device and remote interfaces in at least one downstream remote device that connect to the local interfaces identified in the local topology information, wherein the at least one downstream remote device comprises an end device or expander connecting to further end devices or expanders to which the local interfaces connect; for each connected downstream remote interface, determining a device type of the one remote device including the remote interface; and for each local interface attached to one remote interface in one of the downstream remote devices whose determined device type is of a specified device type, initiating communication with the remote interface to access remote topology information from the downstream remote device indicating downstream devices attached directly and indirectly to the remote device, wherein the downstream devices with respect to the remote device comprise an end device or expander connecting to further end devices or expanders to which the remote device connects.

Applicants amended these claims to clarify that the topology being generated is a local topology for the local interfaces. Applicants further amended the claims to clarify that the

remote device comprises a downstream device, including the definition of downstream. These added requirements are disclosed on at least paras. 9, 10, 13, and 20.

The Examiner cited col. 4, lines 8-9 with respect to the limitation concerning initiating communication (Office Action, pg. 3), which now recites for each local interface attached to one remote interface in one of the downstream remote devices whose determined device type is of a specified device type, initiating communication with the remote interface to access remote topology information from the downstream remote device indicating downstream devices attached directly and indirectly to the remote device, wherein the downstream devices with respect to the remote device comprise an end device or expander connecting to further end devices or expanders to which the remote device connects. Applicants traverse the Examiner findings with respect to the amended claims.

The cited col. 4 discusses receiving configuration information and determining neighboring devices, including sending information requests to collect Layer 2 and 3 configuration information for the devices. Information about what devices are in the network is generally called Layer 3 information, and information about how the devices are physically connected within the network is called Layer 2 information. (col. 1, lines 42-50).

Although the cited col. 4 mentions that configuration information on neighboring devices is determined, nowhere is there any disclosure or mention of the claim requirement that for each local interface attached to one remote interface in one of the downstream remote devices whose determined device type is of a specified device type, that communication is initiated to obtain remote topology information from the downstream remote device. Further, nowhere is there any disclosure that a device receives remote topology information from an attached downstream remote device indicating downstream devices attached directly and indirectly to the remote device. Instead, the cited col. 4 mentions obtaining information on neighboring devices, but does not disclose receiving remote topology information from attached downstream remote devices that indicates other downstream devices directly and indirectly attached to the remote device from which the topology information is received.

Accordingly, the amend claims 1, 11, 19, and 22 are patentable over the cited art because the cited Kracht does not disclose the additional requirements of these claims.

Claims 2-9 and 11-15, 20, 21, and 23-26 are patentable over the cited art because they depend from one of claims 1, 11, 19, and 22, which are patentable over the cited art for the

reasons discussed above. Moreover, the following dependent claims provide additional grounds of patentability over the cited art.

Amended claim 4 depends from claims 1 and further requires receiving at the remote device a request for the remote topology information from the local device; determining at the remote device whether the remote topology information is completed, wherein the remote topology information is completed if the remote topology information indicates information on downstream devices to which the remote device is directly and indirectly connected; and transmitting the remote topology information to the local device in response to determining that the remote topology information is completed.

Applicants amended claim 4 to further recite that the remote topology information is completed if the remote topology information indicates information on downstream devices to which the remote device is directly and indirectly connected. This added requirement is disclosed on at least para. 18, pgs. 9-10 of the Specification and in canceled dependent claim 5.

The Examiner cited col. 11, lines 10-11 and col. 10, lines 35-39 with respect to the requirements of determining at the remote device whether the remote topology information is completed and transmitting the remote topology information to the local device in response to determining that the remote topology information is completed. (Office Action, pg. 4) Applicants traverse.

The cited col. 11 mentions discarding false known device information and the cited col. 10 mentions that for each known device that is a switch, the discovery mechanism sends SNMP requests to the device's agent to obtain its bridge table information, which may include its bridge port index and MAC address information, and which is maintained by the particular switching device.

Although the cited cols. 10 and 11 discuss sending a discovery request for bridge table information and discarding false information, there is no disclosure or mention in the cited cols. 10 and 11 of in response to a request for remote topology information, determining at the remote device whether the remote topology information is completed and transmitting the remote topology information to the local device in response to determining that the remote topology information is completed. For instance, there is no disclosure that the switch determines whether its bridge table information is completed in response to a request for table information.

The Examiner cited col. 3, lines 64-66 with respect to the requirements of claim 5 added to claim 4 concerning that the remote topology information is completed if the remote topology information indicates information on downstream devices to which the remote device is directly and indirectly connected. (Office Action, pg. 4) Applicants traverse.

The cited col. 3 mentions creating and storing information that represents the topology based on the information representing the plurality of devices and the information representing the true neighboring devices and each link.

Although the cited col. 3 mentions that the topology represents a plurality of devices and information on neighboring devices, there is no disclosure that remote topology information is determined to be completed if the remote topology information indicates information on devices to which the remote device is directly and indirectly connected. There is no disclosure or mention in the cited col. 3 of determining whether remote topology information is completed.

Accordingly, claim 4 provides additional grounds of patentability over the cited art because the additional requirements of these claims are not disclosed in the cited Kracht.

Amended claims 16 and 27 substantially include the requirements of amended claim 4. (Office Action, pg. 4). Applicants submit that claims 16 and 27 are patentable over the cited art for the reason discussed with respect to claim 4.

Conclusion

For all the above reasons, Applicant submits that the pending claims _____ are patentable. Should any additional fees be required beyond those paid, please charge Deposit Account No. 50-0585.

The attorney of record invites the Examiner to contact him at (310) 553-7977 if the Examiner believes such contact would advance the prosecution of the case.

Dated: November 8, 2007

By:_____

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